

IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:

MOTORS LIQUIDATION COMPANY *et al.*,

f/k/a GENERAL MOTORS CORP. *et al.*,

Debtors.

Chapter 11

Case No. 09-50026 (REG)

(Jointly Administered)

**DECLARATION OF MARK GRANGER**

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Southern District of New York  
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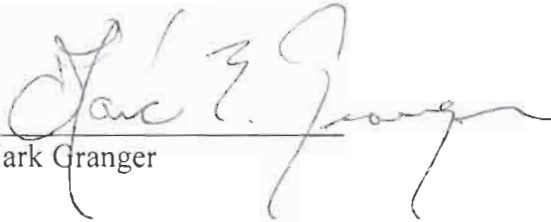
Mark Granger, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury as follows:

1. I am a Remedial Project Manager in the Emergency and Remedial Response Division of the United States Environmental Protection Agency ("EPA"), Region 2, 290 Broadway, New York, New York 10007.
2. I have been with the Emergency and Remedial Response Division since 1990.
3. I received a Bachelor of Arts/Bachelor of Science in philosophy/biology from Ramapo College in 1985.
4. As part of my official duties for the purposes of this bankruptcy, I developed an estimate of the cost of EPA's oversight for the Salina Landfill subsite of the Onondaga Lake Superfund Site in Onondaga County, New York. Because EPA is the support agency at this subsite, I estimated that EPA is likely to incur \$10,000 per year for the first five years following the issuance of the September 2010 record of decision for oversight of the construction of the remedy. I then estimated that for the following 25 years, EPA would incur \$5,000 overseeing the operation and maintenance of the remedy. In total, I estimated that EPA will spend approximately \$175,000 from the signing of the September 2010 record of decision at this subsite.
5. At the time the settlement amounts were negotiated, EPA's unreimbursed past costs at this subsite were \$439,240.
6. Based on available information and for the purposes of resolving EPA's claims in this bankruptcy, I estimated that, because Motors Liquidation Corporation ("MLC") is one of five potentially responsible parties who were notified of their liability of this subsite, MLC may be liable for 20% of the costs EPA has incurred and will incur. Thus, I estimated that MLC is

liable for \$87,848 of EPA's past costs and for \$35,000 of EPA's future costs.

I declare under the penalty of perjury that the above is true and correct.

Executed June 13, 2012, in New York, NY.

  
Mark Granger